

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:18-cv-00566-APM**

MAJUC et al v. UNITED STATES DEPARTMENT OF
JUSTICE

Assigned to: Judge Amit P. Mehta

Cause: 05:552 Freedom of Information Act

Date Filed: 03/13/2018

Jury Demand: None

Nature of Suit: 895 Freedom of
Information Act

Jurisdiction: U.S. Government Defendant

Plaintiff

JOHNMARK MAJUC

represented by **Phillip Lee**
REICHMAN JORGENSEN LLP
303 Twin Dolphin Drive
Suite 600
Redwood City, CA 94065
650-623-1409
Fax: 650-623-1449
Email: plee@reichmanjorgensen.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Elizabeth V. Curran
MCKOOL SMITH P.C.
One Bryant Park
47th Floor
New York, NY 10036
(212) 402-9400
Fax: (212) 402-9444
Email: ecurran@mckoolsmith.com
PRO HAC VICE
ATTORNEY TO BE NOTICED

Kathryn Lee Boyd
MCKOOL SMITH, P.C.
1 CAL PLAZA
300 South Grand Avenue
Suite 2900
Los Angeles, CA 90071
(213) 694-1200
Email: lboyd@mckoolsmith.com
ATTORNEY TO BE NOTICED

Thomas B. Watson
MCKOOL SMITH HENNIGAN, P.C.
300 S. Grand Avenue
Suite 2900
Los Angeles, CA 90071
(213) 694-1095
Email: TWatson@MckoolSmith.com
PRO HAC VICE
ATTORNEY TO BE NOTICED

Tiffany Heavlin Riffer
HOLLINGSWORTH LLP
1350 I Street NW
Washington, DC 20005
202-8985810
Email: theavlin@hollingsworthllp.com
TERMINATED: 04/17/2018

Plaintiff

JOSEPH JOK

represented by **Phillip Lee**
 (See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Elizabeth V. Curran
 (See above for address)
PRO HAC VICE
ATTORNEY TO BE NOTICED

Kathryn Lee Boyd
 (See above for address)
ATTORNEY TO BE NOTICED

Thomas B. Watson
 (See above for address)
PRO HAC VICE
ATTORNEY TO BE NOTICED

Tiffany Heavlin Riffer
 (See above for address)
TERMINATED: 04/17/2018

V.

Defendant

**UNITED STATES DEPARTMENT
OF JUSTICE**

represented by **Melanie Dyani Hendry**
 U.S. ATTORNEY'S OFFICE FOR THE
 DISTRICT OF COLUMBIA
 555 Fourth Street, NW
 Washington, DC 20530
 (202) 252-2510
 Fax: (202) 252-2599
 Email: melanie.hendry2@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
03/13/2018	<u>1</u>	COMPLAINT against UNITED STATES DEPARTMENT OF JUSTICE (Filing fee \$ 400 receipt number 0090-5372363) filed by JOHNMARK MAJUC, JOSEPH JOK. (Attachments: # <u>1</u> Exhibit 1 – FOIA Request, # <u>2</u> Exhibit 2 – Plea Agreement, # <u>3</u> Exhibit 3 – Second Amended Complaint, # <u>4</u> Exhibit 4 – Stmt of Facts, # <u>5</u> Exhibit 5 – Confirmation Email, # <u>6</u> Exhibit 6 – Ack of FOIL Request, # <u>7</u> Exhibit 7 – Request Denial, # <u>8</u> Exhibit 8 – Appeal, # <u>9</u> Exhibit 9 – 7-20-17 Acknowledgment, # <u>10</u> Exhibit 10 – 8-4-17 Acknowledgment, # <u>11</u> Exhibit 11 – Appeal Denial, # <u>12</u> Civil Cover Sheet, # <u>13</u> Summons)(Heavlin, Tiffany) (Entered: 03/13/2018)
03/13/2018		Case Assigned to Judge Amit P. Mehta. (zmd) (Entered: 03/14/2018)
03/14/2018		SUMMONS Not Issued as to UNITED STATES DEPARTMENT OF JUSTICE, U.S. Attorney, U.S. Attorney General. (zmd) (Entered: 03/14/2018)
03/15/2018	<u>2</u>	REQUEST FOR SUMMONS TO ISSUE filed by JOHNMARK MAJUC, JOSEPH JOK. (Attachments: # <u>1</u> Summons, # <u>2</u> Summons)(Heavlin, Tiffany) (Entered: 03/15/2018)
03/15/2018	<u>3</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Elizabth Curran, :Firm– McKool Smith, P.C., :Address– One Bryant Park, 47th Floor, New York, NY 10036. Phone No. – 212-402-9481. Fax No. – 212-402-9444 Filing fee \$ 100, receipt number 0090-5375140. Fee Status: Fee Paid. by JOSEPH JOK, JOHNMARK MAJUC (Attachments: # <u>1</u> Declaration, # <u>2</u> Text of Proposed Order, # <u>3</u> Certificate of Service)(Heavlin, Tiffany) (Entered: 03/15/2018)

03/16/2018		MINUTE ORDER granting <u>3</u> Motion for Leave to Appear Pro Hac Vice. Attorney Elizabeth Curran is hereby admitted pro hac vice to appear in this matter. Signed by Judge Amit P. Mehta on 03/16/2018. (lcapm3) (Entered: 03/16/2018)
03/16/2018	<u>4</u>	SUMMONS (3) Issued Electronically as to UNITED STATES DEPARTMENT OF JUSTICE, U.S. Attorney and U.S. Attorney General (znmw) (Entered: 03/16/2018)
03/26/2018	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES DEPARTMENT OF JUSTICE served on 3/20/2018 (Heavlin, Tiffany) (Entered: 03/26/2018)
03/26/2018	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 3/19/2018. (Heavlin, Tiffany) (Entered: 03/26/2018)
03/26/2018	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 3/26/2018. Answer due for ALL FEDERAL DEFENDANTS by 4/25/2018. (Heavlin, Tiffany) (Entered: 03/26/2018)
04/17/2018	<u>8</u>	NOTICE of Appearance by Phillip Lee on behalf of JOSEPH JOK, JOHNMARK MAJUC (Lee, Phillip) (Entered: 04/17/2018)
04/17/2018	<u>9</u>	NOTICE OF WITHDRAWAL OF APPEARANCE as to JOSEPH JOK, JOHNMARK MAJUC. Attorney Tiffany Heavlin terminated. (Lee, Phillip) (Entered: 04/17/2018)
04/23/2018	<u>10</u>	ANSWER to Complaint by UNITED STATES DEPARTMENT OF JUSTICE.(Hendry, Melanie) (Entered: 04/23/2018)
04/24/2018	<u>11</u>	ORDER. Both a Complaint and an Answer are now before the court in this FOIA case. It is hereby ordered that the parties shall meet and confer and file a Joint Status Report on or before May 8, 2018. See the attached Order for details. Signed by Judge Amit P. Mehta on 04/24/2018. (lcapm3) (Entered: 04/24/2018)
04/24/2018		Set/Reset Deadlines/Hearings: Joint Status Report due by 5/8/2018. (zcdw) (Entered: 04/24/2018)
05/01/2018	<u>12</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Thomas B. Watson, :Firm– McKool Smith Hennigan, P.C., :Address– 300 South Grand Ave., 29th Floor, Los Angeles, CA 90071. Phone No. – 213–694–1200. Fax No. – 213–694–1234 Filing fee \$ 100, receipt number 0090–5454523. Fee Status: Fee Paid. by JOSEPH JOK, JOHNMARK MAJUC (Attachments: # <u>1</u> Declaration, # <u>2</u> Text of Proposed Order)(Lee, Phillip) (Entered: 05/01/2018)
05/01/2018	<u>13</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Kathryn L. Boyd, :Firm– McKool Smith Hennigan, P.C., :Address– 300 South Grand Ave., 29th Floor, Los Angeles, CA 90071. Phone No. – (213)694–1200. Fax No. – (213)694–1234 Filing fee \$ 100, receipt number 0090–5454646. Fee Status: Fee Paid. by JOSEPH JOK, JOHNMARK MAJUC (Attachments: # <u>1</u> Declaration, # <u>2</u> Text of Proposed Order)(Lee, Phillip) (Entered: 05/01/2018)
05/01/2018		MINUTE ORDER granting <u>12</u> Motion for Leave to Appear Pro Hac Vice. Attorney Thomas B. Watson is hereby admitted pro hac vice to appear in this matter. Signed by Judge Amit P. Mehta on 05/01/2018. (lcapm3) (Entered: 05/01/2018)
05/01/2018		MINUTE ORDER granting <u>13</u> Motion for Leave to Appear Pro Hac Vice. Attorney Kathryn L. Boyd is hereby admitted pro hac vice to appear in this matter. Signed by Judge Amit P. Mehta on 05/01/2018. (lcapm3) (Entered: 05/01/2018)
05/08/2018	<u>14</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF JUSTICE. (Hendry, Melanie) (Entered: 05/08/2018)
05/09/2018	<u>15</u>	ORDER entering the briefing schedule proposed in the parties' <u>14</u> Joint Status Report. The schedule for further proceedings in this matter is as follows: (1) Defendant's Motion for Summary Judgment is due on or before August 17, 2018; (2) Plaintiffs' Opposition to Defendant's Motion and Cross–Motion for Summary Judgment is due on or before September 17, 2018; (3) Defendant's Reply and Opposition to Plaintiffs' Cross–Motion for Summary Judgment is due on or before October 17, 2018; and (4) Plaintiffs' Reply is due on or before November 7, 2018. See the attached Order for

		additional details. Signed by Judge Amit P. Mehta on 05/09/2018. (lcapm3) (Entered: 05/09/2018)
05/09/2018		Set/Reset Deadlines/Hearings: Defendant's Summary Judgment motion due by 8/17/2018. Response to Motion for Summary Judgment due by 9/17/2018. Reply to Motion for Summary Judgment due by 10/17/2018. Plaintiffs' Cross Motion due by 9/17/2018. Response to Cross Motion due by 10/17/2018. Reply to Cross Motion due by 11/7/2018. (zcdw) (Entered: 05/11/2018)
08/10/2018	<u>16</u>	Consent MOTION for Extension of Time to File <i>Summary Judgment Motion</i> by UNITED STATES DEPARTMENT OF JUSTICE (Hendry, Melanie) (Entered: 08/10/2018)
08/14/2018		MINUTE ORDER granting Defendant's <u>16</u> Consent Motion for Extension of Time. The schedule for further proceedings in this matter is as follows: (1) Defendant's Motion for Summary Judgment is due on or before September 18, 2018; (2) Plaintiffs' Opposition to Defendant's Motion and Cross-Motion for Summary Judgment is due on or before October 18, 2018; (3) Defendant's Reply and Opposition to Plaintiffs' Cross-Motion for Summary Judgment is due on or before November 16, 2018; and (4) Plaintiffs' Reply is due on or before December 7, 2018. Signed by Judge Amit P. Mehta on 08/14/2018. (lcapm3) (Entered: 08/14/2018)
08/14/2018		Set/Reset Deadlines: Defendant's Motion for Summary Judgment due by 9/18/2018. Plaintiff's Opposition and Cross-Motion for Summary Judgment due by 10/18/2018. Defendant's Reply and Opposition due by 11/16/2018. Plaintiff's Reply due by 12/7/2018. (zjd) (Entered: 08/15/2018)
09/17/2018	<u>17</u>	MOTION for Extension of Time to File <i>Summary Judgment Motion</i> by UNITED STATES DEPARTMENT OF JUSTICE (Hendry, Melanie) (Entered: 09/17/2018)
09/17/2018	<u>18</u>	Amended MOTION for Extension of Time to File <i>Summary Judgment Motion</i> by UNITED STATES DEPARTMENT OF JUSTICE (Hendry, Melanie) (Entered: 09/17/2018)
09/17/2018		MINUTE ORDER granting <u>18</u> Motion for Extension of Time. The schedule for further proceedings in this matter is as follows: (1) Defendant's Motion for Summary Judgment is due on or before October 18, 2018; (2) Plaintiffs' Opposition to Defendant's Motion and Cross-Motion for Summary Judgment is due on or before November 19, 2018; (3) Defendant's Reply and Opposition to Plaintiffs' Cross-Motion for Summary Judgment is due on or before December 19, 2018; and (4) Plaintiffs' Reply is due on or before January 9, 2019. Signed by Judge Amit P. Mehta on 09/17/2018. (lcapm3) (Entered: 09/17/2018)
09/17/2018		Set/Reset Deadlines: Defendant's Motion for Summary Judgment due by 10/18/2018. Plaintiff's Opposition and Cross-Motion for Summary Judgment due by 11/19/2018. Defendant's Reply and Opposition due by 12/19/2018. Plaintiff's Reply due by 1/9/2019. (zjd) (Entered: 09/18/2018)
10/17/2018	<u>19</u>	Consent MOTION for Extension of Time to File <i>Summary Judgment Motion</i> by UNITED STATES DEPARTMENT OF JUSTICE (Hendry, Melanie) (Entered: 10/17/2018)
10/18/2018		MINUTE ORDER granting Defendant's <u>19</u> Consent Motion for Extension of Time to File Motion for Summary Judgment. Defendant's Summary Judgment shall be due on or before November 8, 2018; Plaintiffs' Opposition to Defendant's Motion for Summary Judgment and Plaintiffs' Cross-Motion for Summary Judgment shall be due on or before December 10, 2018; Defendant's Opposition to Plaintiffs' Cross-Motion for Summary Judgment and Reply to Plaintiffs' Opposition to Defendant's Summary Judgment shall be due on or before January 18, 2019; and Plaintiffs' Reply to Defendant's Opposition to Plaintiffs' Cross-Motion for Summary Judgment shall be due on or before February 8, 2019. Signed by Judge Amit P. Mehta on 10/18/2018. (lcapm3) (Entered: 10/18/2018)
10/18/2018		Set/Reset Deadlines: Defendant's Summary Judgment Motion due by 11/8/2018. Plaintiff's Opposition Cross-Motion for Summary Judgment and due by 12/10/2018. Defendant's Opposition and Reply due by 1/18/2019.. Plaintiff's Reply due by 2/8/2019. (zjd) (Entered: 10/19/2018)

11/13/2018	<u>20</u>	Consent MOTION for Extension of Time to File <i>Summary Judgment Motion</i> by UNITED STATES DEPARTMENT OF JUSTICE (Hendry, Melanie) (Entered: 11/13/2018)
11/14/2018		MINUTE ORDER granting Defendant's <u>20</u> Consent Motion for Extension of Time to File Motion for Summary Judgment. Defendant's Motion for Summary Judgment shall be due on or before November 20, 2018; Plaintiffs' Opposition to Defendant's Motion for Summary Judgment and Plaintiffs' Cross-Motion for Summary Judgment shall be due on or before January 10, 2019; Defendant's Opposition to Plaintiffs' Cross-Motion for Summary Judgment and Reply to Plaintiffs' Opposition to Defendant's Motion for Summary Judgment shall be due on or before February 12, 2019; and Plaintiffs' Reply to Defendant's Opposition to Plaintiffs' Cross-Motion for Summary Judgment shall be due on or before March 5, 2019. Signed by Judge Amit P. Mehta on 11/14/2018. (lcapm3) (Entered: 11/14/2018)
11/14/2018		Set/Reset Deadlines: Defendant's Motion for Summary Judgment due by 11/20/2018. Plaintiff's Opposition and Cross-Motion for Summary Judgment due by 1/10/2019. Defendant's Opposition and Reply due by 2/12/2019. Plaintiff's Reply due by 3/5/2019. (zjd) (Entered: 11/16/2018)
11/20/2018	<u>21</u>	MOTION for Summary Judgment by UNITED STATES DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Statement of Facts, # <u>2</u> Public Declaration of John E. Cunningham III)(Hendry, Melanie) (Entered: 11/20/2018)
11/20/2018	<u>22</u>	Consent MOTION for Leave to File <i>Declaration Ex Parte and In Camera</i> by UNITED STATES DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Redacted Ex Parte and In Camera Declaration of John E. Cunningham III)(Hendry, Melanie) (Entered: 11/20/2018)
11/21/2018		MINUTE ORDER granting <u>22</u> Defendant's Unopposed Motion for Leave to Submit Declaration Ex Parte and In Camera. Signed by Judge Amit P. Mehta on 11/21/2018. (lcapm3) (Entered: 11/21/2018)
01/07/2019	<u>23</u>	Consent MOTION for Extension of Time to File <i>Plaintiffs' Opposition to Defendant's Summary Judgment Motion and Plaintiffs' Cross-Motion for Summary Judgment</i> by JOSEPH JOK, JOHNMARK MAJUC (Watson, Thomas) (Entered: 01/07/2019)
01/08/2019		MINUTE ORDER granting <u>23</u> Consent Motion for Extension of the Time. The amended schedule is as follows: Plaintiffs' Opposition to Defendant's Motion for Summary Judgment and Plaintiffs' Cross-Motion for Summary Judgment shall be due on or before January 31, 2019; Defendant's Opposition to Plaintiffs' Cross-Motion for Summary Judgment and Reply to Plaintiffs' Opposition to Defendant's Motion for Summary Judgment shall be due on or before March 5, 2019; and Plaintiffs' Reply to Defendant's Opposition to Plaintiffs' Cross-Motion for Summary Judgment shall be due on or before March 26, 2019. Signed by Judge Amit P. Mehta on 01/08/2019. (lcapm3) (Entered: 01/08/2019)
01/08/2019		Set/Reset Deadlines: Plaintiffs' Opposition and Cross-Motion due by 1/31/2019. Defendant's Reply and Opposition due by 3/5/2019. Plaintiffs' Reply due by 3/26/2019. (zjd) (Entered: 01/08/2019)
01/30/2019	<u>24</u>	Consent MOTION for Extension of Time to File <i>Plaintiffs' Opposition to Defendant's Summary Judgment Motion and Plaintiffs' Cross-Motion for Summary Judgment</i> by JOSEPH JOK, JOHNMARK MAJUC (Watson, Thomas) (Entered: 01/30/2019)
01/31/2019		MINUTE ORDER granting <u>24</u> Plaintiff's Consent Motion for Extension of Time. The court sets the following schedule for further proceedings in this matter: Plaintiffs' Opposition to Defendant's Motion for Summary Judgment and Cross-Motion for Summary Judgment shall be filed on or before February 28, 2019; Defendant's Opposition to Plaintiffs' Cross-Motion and Defendant's Reply shall be filed on or before April 2, 2019; and Plaintiff's Reply shall be filed on or before April 23, 2019. Signed by Judge Amit P. Mehta on 01/31/2019. (lcapm3) (Entered: 01/31/2019)
01/31/2019		Set/Reset Deadlines: Plaintiff's Opposition and Cross-Motion due by 2/28/2019. Defendant's Opposition and Reply due by 4/2/2019. Plaintiff's Reply due by 4/23/2019. (zjd) (Entered: 02/05/2019)

02/26/2019	<u>25</u>	Consent MOTION for Extension of Time to File <i>Plaintiffs' Opposition to Defendant's Summary Judgment Motion and Plaintiffs' Cross-Motion for Summary Judgment</i> by JOSEPH JOK, JOHNMARK MAJUC (Attachments: # <u>1</u> Text of Proposed Order)(Watson, Thomas) (Entered: 02/26/2019)
02/26/2019		MINUTE ORDER granting <u>25</u> Plaintiffs' Consent Motion for Extension of Time. The court sets the following schedule for further proceedings in this matter: Plaintiffs' Cross-Motion and Opposition shall be filed on or before March 14, 2019; Defendant's Reply and Opposition to Plaintiffs' Cross-Motion shall be filed on or before April 23, 2019; and Plaintiffs' Reply shall be filed on or before May 14, 2019. Signed by Judge Amit P. Mehta on 02/26/2019. (lcapm3) (Entered: 02/26/2019)
02/26/2019		Set/Reset Deadlines/Hearings: Plaintiffs' Cross Motion and Opposition due by 3/14/2019. Defendant's Opposition and Reply due by 4/23/2019. Plaintiffs' Reply due by 5/14/2019. (zjd) (Entered: 03/10/2019)
03/11/2019	<u>26</u>	Consent MOTION for Extension of Time to File <i>Plaintiffs' Opposition to Defendant's Summary Judgment Motion and Plaintiffs' Cross-Motion for Summary Judgment</i> by JOSEPH JOK, JOHNMARK MAJUC (Attachments: # <u>1</u> Text of Proposed Order)(Watson, Thomas) (Entered: 03/11/2019)
03/12/2019		MINUTE ORDER granting <u>26</u> Consent Motion for Extension of Time. The court sets the following schedule for further proceedings in this matter: Plaintiffs' Cross-Motion and Opposition to Defendant's Motion shall be filed on or before April 11, 2019; Defendant's Reply and Opposition to Plaintiffs' Cross-Motion shall be filed on or before May 21, 2019; and Plaintiffs' Reply shall be filed on or before June 11, 2019. Signed by Judge Amit P. Mehta on 03/12/2019. (lcapm3) (Entered: 03/12/2019)
03/12/2019		Set/Reset Deadlines: Plaintiffs' Cross Motion and Opposition due by 4/11/2019. Defendant's Reply and Opposition due by 5/21/2019. Plaintiff's Reply due by 6/11/2019. (zjd) (Entered: 03/21/2019)
04/10/2019	<u>27</u>	Consent MOTION for Extension of Time to File <i>Plaintiffs' Opposition to Defendant's Summary Judgment Motion and Plaintiffs' Cross-Motion for Summary Judgment</i> by JOSEPH JOK, JOHNMARK MAJUC (Attachments: # <u>1</u> Text of Proposed Order)(Watson, Thomas) (Entered: 04/10/2019)
04/11/2019		MINUTE ORDER granting <u>27</u> Consent Motion for Extension of Time. The court sets the following schedule for further proceedings in this matter: Plaintiffs' Opposition and Cross-Motion shall be filed on or before April 18, 2019; Defendant's Opposition and Reply shall be filed on or before June 19, 2019; and Plaintiffs' Reply shall be filed on or before July 10, 2019. Signed by Judge Amit P. Mehta on 04/11/2019. (lcapm3) (Entered: 04/11/2019)
04/11/2019		Set/Reset Deadlines: Plaintiffs' Opposition and Cross-Motion due by 4/18/2019. Defendant's Reply and Opposition due by 6/19/2019. Plaintiff's Reply due by 7/10/2019. (zjd) (Entered: 04/12/2019)
04/18/2019	<u>28</u>	Memorandum in opposition to re <u>21</u> MOTION for Summary Judgment filed by JOSEPH JOK, JOHNMARK MAJUC. (Attachments: # <u>1</u> Statement of Facts, # <u>2</u> Request for Judicial Notice, # <u>3</u> Declaration of Thomas B. Watson)(Watson, Thomas) (Entered: 04/18/2019)
04/18/2019	<u>29</u>	Cross MOTION for Summary Judgment < <i>MOTION to Take Judicial Notice/i</i> > by JOSEPH JOK, JOHNMARK MAJUC (Attachments: # <u>1</u> Statement of Facts, # <u>2</u> Request for Judicial Notice, # <u>3</u> Declaration of Thomas B. Watson)(Watson, Thomas). Added MOTION to Take Judicial Notice on 4/19/2019 (jf). (Entered: 04/18/2019)
06/18/2019	<u>30</u>	Consent MOTION for Extension of Time to File Response/Reply by UNITED STATES DEPARTMENT OF JUSTICE (Hendry, Melanie) (Entered: 06/18/2019)